

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JENI RIEGER,, *et al.*, individually and
on behalf of all others similarly
situated,

Plaintiffs,

v.

VOLKSWAGEN GROUP OF
AMERICA, INC., a New Jersey
corporation, d/b/a AUDI OF
AMERICA, INC.,

Defendant.

Case No. 1:21-cv-10546-NLH-EAP

CERTIFICATION OF RUSSELL D.
PAUL IN SUPPORT OF VENUE FOR
CLASS ACTION COMPLAINT
PURSUANT TO CAL. CIVIL CODE
§1780(d)

DEMAND FOR JURY TRIAL

I, Russell D. Paul, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and a shareholder at the law firm of Berger Montague PC, co-counsel for Plaintiffs in this matter. I have personal knowledge of the facts set forth herein and, if called upon to do so, could and would testify competently thereto.

2. I make this statement on behalf of Plaintiffs and in support of Plaintiffs' First Amended Consolidated Class Action Complaint, which is based in part on violations of the Consumers Legal Remedies Act, California Civil Code §§ 1750 *et seq.*

3. Defendant Volkswagen Group of America, Inc. is incorporated in New Jersey. Defendant conducts substantial business, including the acts and practices at issue in this action, in this District.

4. Based on the foregoing facts set forth herein, this Court is the proper place for trial of this action and the filing of Plaintiffs' First Amended Consolidated Class Action Complaint.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: June 2, 2023

s/ Russell D. Paul

Russell D. Paul (NJ Bar. No. 037411989)

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